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7 *Attorneys for United States*

8
9 IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,)
11 Plaintiff,) Case No. 2:17-cv-3048-GWN-DJA
12 v.)
13) **JOINT MOTION TO VACATE AND**
ESTATE OF SANDRA DE FORREST) **RESET PRETRIAL ORDER**
14) **DEADLINE**
15 Defendant.)
16 _____)

17 The United States of America and Defendant Estate of Sandra De Forrest (“the parties”),
18 by and through their undersigned counsel, hereby move the Court to vacate and reset the
19 deadline to submit a proposed pretrial order in this case, currently set for August 28, 2020, for at
20 least 60 days. For the reasons set forth below, the parties submit that good cause exists for such
21 action.

1 1. On January 13, 2020, the Defendant submitted a settlement offer to the United
2 States. Due to the amount at issue in this case, that settlement offer must be reviewed by senior
3 Department of Justice and IRS officials.

4 2. On May 31, 2020, while Defendant's settlement offer was still under
5 consideration by the Department, this Court ordered the parties to submit a proposed pretrial
6 order by June 30, 2020. Dkt. # 52.

7 3. On June 12, 2020, after further settlement discussions between the parties, the
8 Defendant submitted a revised formal settlement offer to the United States. Again, that
9 settlement offer must be reviewed by senior Department of Justice and IRS officials prior to
10 being accepted by the Department. That review has been ongoing.

11 4. Recently, the IRS requested that the Defendant submit additional supporting
12 documents in connection with the settlement offer. Defendant is in the process of attempting to
13 obtain that material.

14 5. Given the above, the parties request that the Court grant this motion to vacate and
15 reset the pretrial order. Granting this motion would permit the parties to attempt to resolve this
16 case without further litigation expense, thereby conserving the resources of the parties and the
17 Court.

18 6. Granting the motion will not impact any other deadline in this case. Therefore,
19 this requested extension will not prejudice the timely, orderly, efficient resolution of this case.

20 WHEREFORE, the parties hereby move the Court to vacate the deadline to submit a
21 proposed pretrial order and reset it to a date no sooner than 60 days from the date of such action.
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1 Dated: August 28, 2020.

2 Respectfully submitted,

3 RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General

4 /s/Rick Watson
5 RICK WATSON
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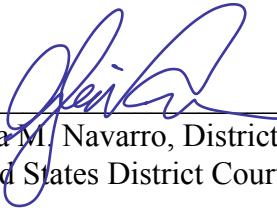
16 *Attorneys for Estate of*
17 *Sandra J. de Forrest*

18 **ORDER**

19 **IT IS HEREBY ORDERED** that the above Joint Motion to Vacate and Reset Pretrial
Order Deadline, (ECF No. 55), is **GRANTED**. The parties shall submit a proposed joint pretrial
20 order by November 2, 2020.

21 **DATED** this 8 day of September, 2020.

22 **NUNC PRO TUNC:** August 31, 2020.

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Gloria M. Navarro, District Judge
United States District Court